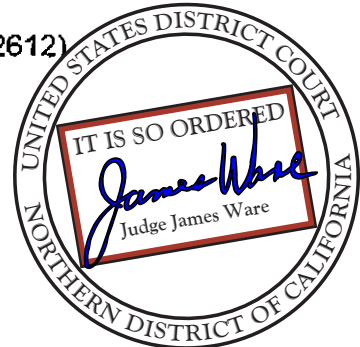


RICHARD DOYLE, City Attorney (#88625)
 NORA FRIMANN, Chief Trial Attorney (#93249)
 CLIFFORD GREENBERG, Senior Deputy City Attorney (#122612)
 Office of the City Attorney
 200 East Santa Clara Street
 San Jose, California 95113
 Telephone: (408) 535-1900
 Facsimile: (408) 998-3131
 Email: cao.main@sanjoseca.gov



Attorneys for Defendants
 CITY OF SAN JOSE and GILBERT VIZZUSI,

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE FACILITY

JORGE ALBERT SANCHEZ,

Plaintiff,

v.

CITY OF SAN JOSE, et al.,

Defendants.

NO.: C-04-1683 JW

**STIPULATION AND PROPOSED
 ORDER TO ALTER PRE-TRIAL
 DISCOVERY DATES**
 L.R. 6-2

Counsel for the parties have met and conferred regarding certain dates set forth in the Court's Scheduling Order, dated September 29, 2005. In particular, Plaintiff's counsel is considering filing a motion for summary judgment to be heard at the same time that Defendants' motion will be heard. In order to accomplish this, and in order to complete the discovery that Plaintiff needs to prepare the motion, the parties wish to change the last date for hearing dispositive motions. Currently, that date is February 27, 2006. The parties wish to move that date to March 27, 2006.

This alteration **will not affect** the remainder of the schedule set by the court. This case is set for a Preliminary Pretrial and Trial Setting Conference on April 17, 2006, at 11:00 a.m. No trial date is currently set. Therefore, changing the hearing date on the

summary judgment motions to March 27, 2006 will not interfere with the court's current schedule

Accordingly, the parties hereby stipulate to the following alterations in the Scheduling Order:

<u>Order/Activity:</u>	<u>Original Date:</u>	<u>New Date:</u>
Dispositive Motion Cut-Off	Feb. 27, 2006	March 27, 2006
Close of Expert Discovery	Jan. 20, 2006	30 days prior to Trial

SO STIPULATED:

DATED: JANUARY 30, 2006

LAW OFFICES OF MARC P. FAIRMAN

By: 
MARC P. FAIRMAN

Attorneys for Plaintiff
JORGE SANCHEZ

DATED: JANUARY 31, 2006

RICHARD DOYLE, City Attorney

By: 
CLIFFORD S. GREENBERG
Senior Deputy City Attorney

Attorneys for Defendants
CITY OF SAN JOSE and GILBERT VIZZUSI